

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**CHARITY CHIDINMA
EMERONYE SWIFT,**

Plaintiff,

v.

**FRONTIER AIRLINES, INC.
(a Colorado corporation),
and JANE DOE,**

Defendants.

Civil Action No. 1:14-cv-1139

**Hon. Anthony J. Trenga
Hon. Magistrate Judge Ivan D. Davis**

**PLAINTIFF'S MOTION FOR LEAVE OF COURT
TO AMEND COMPLAINT**

Plaintiff Charity Chidinma Emeronye Swift ("Mrs. Swift"), through her undersigned attorney, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, moves this Court for leave to amend her Complaint, for reasons set forth in the memorandum submitted herewith. Mrs. Swift' counsel has conferred with counsel for Frontier Airlines, Inc., but they have not consented to this motion.

Dated: December 10, 2014

Respectfully submitted,

/s/ Stephen Christopher Swift

Stephen Christopher Swift

Virginia State Bar ID No. 38419

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Attorney for Plaintiff

Charity Chidinma Emeronye Swift

CERTIFICATE OF SERVICE

I hereby certify that, on December 10, 2014, I electronically filed the foregoing document with the Clerk of the Court, using the Court's CM/ECF system, which will automatically cause all counsel of record to be served therewith.

/s/ Stephen Christopher Swift
Stephen Christopher Swift